



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

PT:AAS/MMS  
F.#2012R01872

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 17, 2014

By Hand and ECF

The Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. John Sampson  
Criminal Docket No. 13-269 (S-4)(DLI)

Dear Judge Irizarry:

On behalf of both parties in the above-referenced matter, the government respectfully submits this joint request that the filing date for reply briefs to outstanding motions in limine, which are presently due on December 29, 2014, be adjourned until January 5, 2015.

As the outcome of motions in limine is likely to substantially affect the contours of the trial as well as the content of jury questionnaires, including through determinations as to the admissibility of evidence or argument regarding uncharged conduct, the parties also jointly and respectfully request that the Court schedule a hearing on these motions at the Court's soonest possible convenience after January 12, 2015. Please note that defense counsel is unavailable on January 16, 2015 due to a longstanding and unavoidable conflict.

The parties understand that the Court is on trial during the week of January 12, 2015 and may only be available on January 16, 2015, a date when, as noted above, counsel for the defendant is unavailable. Accordingly, in the alternative, the parties respectfully

request that a hearing be held on January 20, 2015, which is the date the jury questionnaires are scheduled to be distributed.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

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Clerk of Court (DLI) (by ECF)